

# EXHIBIT 1

**From:** [Pollock, Jeffrey M.](#)  
**To:** [Brown, Allison M](#)  
**Cc:** [Sabo, Michael W.](#); [Wiener, Andrea M.](#); [Chapman, Derek R.](#)  
**Subject:** Subpoena Allen of May 17, 2024 and your letter of today  
**Date:** May 20, 2024 6:27:22 PM  
**Attachments:** [MURDICA BATES\(158847420.1\).pdf](#)

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Dear Allison, we object to J&J's subpoena as seeking discovery of litigation funding which is not relevant to your defense of the matter. *In Re Valsartan*, 405 F. Supp.3d 612, 620 (D.N.J. 2019). Further, beyond litigation funding, the entire remainder of your request is based upon Mr. Murdica's blatant violation of RPC 4.2—see (attached). Mr. Murdica had absolutely no legal right to communicate with Ms. Detres. Mr. Murdica was pointedly told at 8:57 AM on May 15, 2024, that Ms. Detres is represented by Beasley Allen. See Murdica 5 attached. KNOWING that Ms. Detres is represented by opposing counsel, Mr. Murdica—who claims to know the Rules of Professional Conduct-- nonetheless expressly engaged in a discussion with Ms. Detres at 5:54 PM regarding the substance of the matter at issue. Murdica 3. Your letter compounds this RPC violation because both you and Mr. Murdica are violating the duty to avoid using inadvertently produced information. See RPC 4.4.

**We demand that you withdraw the subpoena and refrain from using the District of New Jersey as a sounding-board for J&J's false narrative that its efforts to flood the bankruptcy-ballot box is in the interest of J&J's asbestos exposure victims.**

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**JEFFREY M. POLLOCK**

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